

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and IME
MANAGEMENT & CONSULTING LLC,

Defendants.
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Case No.: 1:22-cv-1032 (PKC)(JRC)

**DECLARATION OF
EUGENE LIDDIE**

EUGENE LIDDIE, hereby declares and verifies the truth of the following, under penalty of perjury under the laws of the United States of America, pursuant to Title 28, United States Code, Section 1746:

1. It has come to my attention that I am again being questioned by plaintiff about the validity of my business, IME Legal Reps.

2. Vito Gelardi has informed me that a motion was filed by plaintiff which stated that the phone number of 833-463-7767 still appears on my website (the website I purchased from Vito and Safa Gelardi). This was news to me.

3. The number on my website is 800-409-9921. My website is <https://imelegalreps.com/>. The 800-409-9921 number appears at the bottom of the main page of my website, directly below "CONTACT US." That is the only phone number on the main page. The 800-409-9921 number appears at the bottom of the page under "Services." That is the only number on the "Services" Page. The 800-409-9921 number appears on the "Booking" page of the website. That is the only number on the "Booking" page. The 800-409-9921 number appears on the

“Contact” page on the website. That is the only number on the “Contact” page. Plaintiff has shockingly failed to inform the Court of these facts. Nor has plaintiff bothered to provide the Court with copies of these relevant pages from my website.

4. Plaintiff’s allegation that I am using the 833-463-7767 number for my business is false. I invite the Court to search my website at <https://imelegalreps.com/> for the truth.

5. Plaintiff’s allegation that I am using the 833-463-7767 number for my business is apparently based upon plaintiff’s (or its investigator’s) overzealous searching of my business on the internet coupled with plaintiff’s dishonesty. It appears from plaintiff’s submission that the 833-463-7767 number is somehow listed somewhere in the worldwide web as a number to call to obtain a refund. This can be found at <https://imelegalreps.com/delivery-refund-policy/>, which I only learned upon reviewing plaintiff’s Exhibit “B.” I do not believe that this page is part of my company’s actual website (but I am not a web designer), and I only found this page by searching for it with the URL on plaintiff’s Exhibit “B.” I can only presume that this page must somehow be searchable due to an error by the web designer. I have contacted the web designer and instructed them to fix this error. In any event, the same alleged website page which lists the 833-463-7767 number in the event that you “are unsatisfied with your purchase,” also contains the contact number of 800-409-9922 for IME Legal Reps. Plaintiff has attempted to conceal this fact by only supplying the Court with that portion of the subject page which contains the 833-463-7767 number as its Exhibit “B,” while omitting the true contact information for my company at the bottom of the same page.


6. I incorporated my company in Texas because that is where my brother lives, and I registered my business to his address which is 205 Charleston Ln Fate Texas 75189.

7. I would like to add that I have been harassed due to this case. One of my clients stopped using me because someone had sent them a Court Order which allegedly stated that I was not allowed to service them. I called for clarification and was told that the attorney's office had been told that IME Legal Reps and IME Companions are the same company and that they had been sent a Court Order stating that I was not allowed to service them. I am not aware of any such Order.

8. I have also received fake bookings on my website which have resulted in losses. For example, I sent a Legal Rep to an appointment that was booked on my website in Poughkeepsie, only to find out that the address was a funeral home. When I called the attorney's office for clarification concerning the address, I was told that they had not booked the examination and that they use plaintiff IME Watchdog.

9. I am focused on building my business and cannot afford to be harassed by plaintiff. I respectfully ask this Court to warn plaintiff to leave me and my company out of this dispute which this Court has already determined has nothing to do with me and my fledgling business.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 27, 2024.


Eugene Liddie